STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

RE: APPLICATION BY CELLCO

PARTNERSHIP, d/b/a VERIZON WIRELESS,

FOR A CERTIFICATE OF ENVIRONMENTAL

COMPATIBILITY AND PUBLIC NEED

FOR A TELECOMMUNICATIONS FACILITY AT 723 LEETES ISLAND ROAD, (MEDLYN FARM), IN THE TOWN OF BRANFORD.

CONNECTICUT

DOCKET NO. 413

Date: December 16, 2010

PETITION TO INTERVENE

Pursuant to Connecticut General Statutes ("C.G.S.") Section 16-50n and Regulations of Connecticut State Agencies ("R.C.S.A.") Section 16-50j-15a, T-Mobile Northeast LLC ("T-Mobile") hereby requests permission of the Siting Council ("Council") to participate, as an intervenor in the application and hearing process in the above referenced Docket.

As the Council is aware, T-Mobile is a licensed provider of wireless services in Connecticut. The tower proposed in Docket No. 413 would be an important component in T-Mobile's network design for New Haven County. T-Mobile may therefore be significantly affected by this proceeding.

Finally, T-Mobile has an interest in the hearing and in the pre-hearing process. aiding the Council in evaluating the public interest and need considerations set forth in C.G.S. § 16-50g. T-Mobile's expertise and experience in designing, constructing, operating and maintaining a wireless telecommunications system in the State of Connecticut in accordance with the rules and regulations of the Council, the Department of Public Utility Control and the Federal Communications Commission, may be of benefit to the Council in considering the information presented in Docket No. 413. T-Mobile has been admitted as an intervenor in numerous prior Siting Council dockets.

T-Mobile proposes to participate in the hearing by cross-examining the Applicant's witnesses, offering oral and written testimony or evidence and filing prehearing interrogatories. If the facility is approved, T-Mobile intends to install antennas at the 80-foot level on the proposed 109-foot simulated water tank structure and equipment on a concrete pad near the base of the structure.

For the above-stated reasons, T-Mobile seeks permission to participate in this docket as an intervenor.

Respectfully Submitted,

T-MOBILE NORTHEAST LLC

By:

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CERTIFICATION

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and regular mail, postage prepaid, to all parties and intervenors of record, as follows:

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (Via Email: kbaldwin@rc.com)

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